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17 *Attorneys for Defendant LG Electronics, Inc.*

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

20 IN RE: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION,

Case No. Master File No. 3:07-md-05944-sc

MDL No. 1917

22 This Document Relates to:

23 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
24 *No. 11-cv-05513*

25 *Best Buy Co., et al. v. Technicolor SA, et al.,*
26 *No. 13-cv-05264*

27 *Sears, Roebuck and Co. and Kmart Corp. v.*
28 *Technicolor SA, No. 3:13-cv-05262*

**DECLARATION OF E. MARTIN
ESTRADA IN SUPPORT OF
DEFENDANT LG ELECTRONICS, INC.'S
ADMINISTRATIVE MOTION TO SEAL**

[Administrative Motion to Seal and [Proposed]
Order filed concurrently herewith]

Judge: Hon. Samuel Conti

Date: None Set

Ctrm: 1, 17th Floor

1 *Sears, Roebuck and Co. and Kmart Corp. v.*
2 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
05514

3 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*
4 *et al.*, No. 13-cv-1173

5 *Sharp Electronics Corp., et al. v. Koninklijke*
6 *Philips Elecs., N.V., et al.*, No. 13-cv-2776

7 *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502

8 *Siegel v. Technicolor SA*, No. 13-cv-05261

9 *Target Corp. v. Chunghwa Picture Tubes,*
10 *Ltd.*, No. 11-cv-05514

11 *Target Corp. v. Technicolor SA*, No. 13-cv-
12 05686

13 *ViewSonic Corporation v. Chunghwa Picture*
14 *Tubes Ltd.*, No. 14-cv-2510

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1 I, E. Martin Estrada, declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of record
3 for Defendant LG Electronics, Inc. ("LGE") in the above entitled action. I am licensed in the State
4 of California and admitted to practice before this Court. I make this declaration based on my
5 personal knowledge and, if called upon as a witness, could and would testify competently as to the
6 matters set forth below.

7 2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of
8 Defendant LGE's Administrative Motion to Seal In Connection With Defendants' Motion *In*
9 *Limine* #16 to Permit Evidence and Argument Regarding Upstream Pass-On and Plaintiffs'
10 Bargaining Power.

11 3. LGE seeks permission to file under seal the highlighted portions of the sealed
12 version of Defendants' Motion *In Limine* #16 to Permit Evidence and Argument Regarding
13 Upstream Pass-On and Plaintiffs' Bargaining Power.

14 4. The portions of the documents referenced in Paragraph 3 contain discussion,
15 analysis, references to, or information taken directly from, material designated by a Party in this
16 matter as "HIGHLY CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306) in
17 this case.

18 5. LGE further seeks permission to file under seal the following documents in their
19 entirety: Exhibits A and B to the Declaration of E. Martin Estrada In Support of Defendants'
20 Motion *In Limine* #16 to Permit Evidence and Argument Regarding Upstream Pass-On and
21 Plaintiffs' Bargaining Power.

22 6. The documents referenced in Paragraph 5 have been designated by a Party in this
23 matter as "HIGHLY CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306) in
24 this case.

25 7. LGE seeks to submit the above material under seal in good faith in order to comply
26 with the Stipulated Protective Order in this action and the applicable Local Rules. Because the
27 information LGE seeks to submit under seal has been designated as Highly Confidential by other
28 parties, LGE is filing the accompanying Administrative Motion, and will be prepared to file an

1 unredacted versions of the above-referenced documents in the public record if required by Civil
2 Local Rule 79-5(e).

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct.

5 Executed on February 13, 2015, in Los Angeles, California.

6
7 /s/ E. Martin Estrada

8 E. MARTIN ESTRADA

9 Attorneys for Defendant LG Electronics, Inc.
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